

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
WESTERN DIVISION  
AT CINCINNATI

<b>JOHN KLOSTERMAN</b>	:	Case No. 1:25-cv-00312-SJD-KLL
	:	
Plaintiff,	:	Judge Susan J. Dlott
	:	Magistrate Karen L. Litkovitz
v.	:	
	:	
<b>KONZA, LLC, et al.</b>	:	MOTION FOR ADDITIONAL
	:	TIME TO ANSWER, MOVE, OR
Defendants.	:	PLEAD BY DEFENDANT
	:	KELLER WILLIAMS ADVISORS
	:	REALTY
		LLP FOR JUDICIAL REVIEW
		<u>PURSUANT TO 28 U.S.C. §</u>
		<u>1915(e)(2)(B)</u>

---

Comes now Defendants FRI Mason, LLC., doing business as Keller Williams Advisors Realty ("Keller Williams") and hereby moves the Court pursuant to Rule 6(b)(1)(A) of the Federal Rules of Civil Procedure and Local Rule 7.3(a) for an extension of time to answer or otherwise plead in response to the Complaint and Amended Complaint filed by Plaintiff John Klosterman (Doc #1)(the "Complaint") and (Doc #33)(the "Amended Complaint"). Time period to respond to the Amended Complaint has not yet passed, but Keller Williams is requesting an extension of the time on both the Complaint and Amended Complaint because, Doc 26 filed by the Plaintiff reflects that the Complaint was left at the "front desk, reception area or mail room on May 21, 2025" (Doc 26, PageID307).

While the foregoing is not a valid service, if the Court feels otherwise, Keller Williams respectfully requests additional time to answer, move, or plead to the same as well as the Amended Complaint. Rule 15(3) of the Federal Rule of Civil Procedure states that:

Unless the court orders otherwise, any required response to an amended pleading must be made within the time remaining to respond to the original pleading or within 14 days after service of the amended pleading, whichever is later.

The first time Keller Williams became aware of this case was on July 1, 2025, when the Plaintiff emailed a copy of his Amended Complaint and a Motion for Summary Judgment (Doc. #27) to a Realtor affiliated with Keller Williams. As such, Keller Williams is respectfully requesting Thirty (30) days from July 1, 2025, or until August 1, 2025, to move, respond, or otherwise plead to the Amended Complaint and to the extent needed, the Motion for Summary Judgment.

Respectfully submitted,

/s/ Paul T. Saba, Esq.

Paul T. Saba, Esq. (0063723)

Jeffrey M. Nye, Esq. (0082247)

Bailey E. Sharpe, Esq. (0103565)

SSP Law Co., LPA

2623 Erie Avenue

Cincinnati, OH 45208

513-533-6714

513-533-2999 (fax)

[pts@sspfirm.com](mailto:pts@sspfirm.com)

[jmn@sspfirm.com](mailto:jmn@sspfirm.com)

[bes@sspfirm.com](mailto:bes@sspfirm.com)

**Attorney for FRI Mason, LLC dba  
Keller Williams Advisors Realty**

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a copy of the foregoing was served upon all represented parties through the court's CM/ECF system and on the parties listed below by ordinary mail, on the date of filing.

Respectfully submitted,

/s/ Paul T. Saba, Esq.

Paul T. Saba, Esq. (0063723)